

4. In Plaintiff's Petition, she has asserted federal claims for race discrimination and retaliation under the Title VII of the Civil Rights Act of 1964, as amended by 42 U.S.C. § 2000(e) *et seq.* ("Title VII") and 42 U.S.C. § 1981. Plaintiff further states her claims to include age discrimination in violation of Age Discrimination in Employment Act (ADEA) and Oklahoma's Anti-Discrimination Act (OADA).

5. This civil action is removable to the District Court of the United States because plaintiff's claims arise under the Constitution, laws or treaties of the United States, specifically, the Civil Rights Act, pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1441(a). This civil action is also removable to the District Court of the United States because the parties have diversity of citizenship under 28 U.S.C. § 1332 and the plaintiff has alleged damages in excess of \$75,000.00.

6. The aforementioned action was commenced by service of summons upon Defendant on June 14, 2017. This Notice of Removal is, therefore, timely filed under the provisions of 28 U.S.C. § 1446.

A copy of all process, pleadings, and other documents filed in the State Court Lawsuit are attached hereto as follows:

Exhibit 1 - Petition, filed June 2, 2017

Exhibit 2 - Entry of Appearance - Leah Roper for Plaintiff

Exhibit 3 - Entry of Appearance - Mark Hammons for Plaintiff

Exhibit 4 - Entry of Appearance - Amber L. Hurst for Plaintiff

Exhibit 5 - Summons Returned, filed June 27, 2017

**Exhibit 6 - Docket sheet from the District Court of Oklahoma
County, State of Oklahoma**

Defendant will promptly provide Plaintiff written notice of the filing of this Notice of Removal pursuant to 28 U.S.C. § 1446(d). Defendant will also file a copy of the Notice of Removal with the District Clerk of Oklahoma County, State of Oklahoma.

Respectfully submitted,

s/Melissa R. McDuffey

Adam W. Childers, OBA #18673

Melissa R. McDuffey, OBA #32463

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ATTORNEYS FOR DEFENDANT
MUSCULAR DYSTROPHY
ASSOCIATION, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of July, 2017, the above and foregoing was filed in the Western District Court of Oklahoma, that a true and correct copy of said Notice of Removal was served upon the above-named plaintiff, by mailing said copies to plaintiff's attorney of record, and further that a copy of said Notice of Removal was filed with the Court Clerk of Oklahoma County, Oklahoma.

Mark Hammons
Amber L. Hurst
Leah Roper
Hammons, Gowens & Hurst
325 Dean A. McGee Avenue
Oklahoma City, OK 73102

s/ *Melissa R. McDuffey*
Melissa R. McDuffey